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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BRENNA SCHRADER, an individual, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;  
MAURICE WOODEN, an individual, WYNN  
LAS VEGAS, LLC dba WYNN LAS VEGAS  
a Nevada Limited Liability, WYNN  
RESORTS, LTD, a Nevada Limited Liability  
Company; and DOES 1-20, inclusive; ROE  
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND  
DEADLINE FOR PLAINTIFF TO FILE  
A RESPONSE TO DEFENDANTS'  
MOTION TO STAY DISCOVERY**

**(SECOND REQUEST – to Extend time  
to file a Response to Motions to Stay  
Discovery)**

IT IS HEREBY STIPULATED by and between Plaintiff, Brenna Schrader, (“Plaintiff”),  
through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendants, Wynn Las  
Vegas, LLC (“Defendant WLV”) and Wynn Resorts, Ltd. (“Defendant WRL”), through their  
counsel Jackson Lewis P.C., Defendant, Stephen Alan Wynn (“Mr. Wynn”), through his counsel  
Peterson Baker, PLLC, and Defendant, Maurice Wooden (“Mr. Wooden”), by and through his  
counsel Kennedy & Couvillier, (collectively “Defendants”), that Plaintiff shall have an extension  
up to and including June 7, 2021 to file a response to motions seeking to stay discovery.

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1           This Stipulation is submitted and based upon the following:

2           1.     On April 7, 2021, Mr. Wynn and Defendants WLW and WRL filed Motions to  
3 Stay Discovery [ECF Nos. 101, 106]. Mr. Wooden filed a Joinder [ECF No. 102].

4           2.     Defendants collectively filed five motions starting on March 31, 2021 and ending  
5 on April 7, 2021. [ECF Nos. 98, 99, 101, 103, and 106].

6           3.     Mr. Huber was in trial from April 30, 2021 until May 5, 2021 at the convention  
7 center.

8           4.     Mr. Huber conducted an arbitration on May 7, 2021.

9           5.     The following week Mr. Huber had a series of deadlines that could not be avoided.

10          6.     In addition, Mr. Huber has had unanticipated client matters that had to be  
11 addressed immediately.

12          7.     Due to the complexity of the motions filed, Plaintiff respectfully requests an  
13 extension up to and including June 7, 2021 to file responses.

14          8.     The parties also stipulate the Defendants' Replies to Plaintiff's responses to  
15 Defendants' motions to stay discovery will be due three weeks later, on July 5, 2021.

16          9.     This is the second request for an extension of time for Plaintiff to file a response to  
17 Defendants' motions to stay discovery, and for an extended period for Defendants' reply briefs.

18          10.    This request is made in good faith and not for the purpose of delay.

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11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 20<sup>th</sup> day of May, 2021.

RICHARD HARRIS LAW FIRM

/s/ Burke Huber

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*Stephen Alan Wynn*

**ORDER**

IT IS SO ORDERED:



United Magistrate Judge

Dated: May 24, 2021